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October 12, 2015

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Gina McCarthy, Administrator U.S. Environmental Protection Agency Mail Code: 1101A 1200 Pennsylvania Avenue, N.W. Washington, DC 20460	Samuel Unger, Executive Officer Regional Water Quality Control Board Los Angeles Region 320 West Fourth Street, Suite 200 Los Angeles, CA 90013
Jared Blumenfeld, Regional Administrator U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA 94105	Thomas Howard, Executive Director State Water Resources Control Board 1001 I Street Sacramento, CA 95814

AND THE PUBLIC PROSECUTORS LISTED ON THE DISTRIBUTION LIST ACCOMPANYING
THE ATTACHED CERTIFICATE OF SERVICE

Re: Notice of Violation and Intent to File Suit under the Clean Water Act

To Whom It May Concern:

Brodsky & Smith, LLC ("Brodsky Smith") represent Carlos Guzman ("Guzman"), a citizen of the State of California. This letter is to give notice that Brodsky Smith, on Guzman's behalf, intends to file a civil action against Potential Industries, Inc. ("Potential") for violations of the Federal Water Pollution Control Act, 33 U.S.C. § 1251 *et seq.* ("Clean Water Act" or "CWA") at Potential's facility located at 922 East E. Street, Wilmington, California (the "Facility").

Guzman is a citizen of the State of California who, through his activities as a recreational fisherman, uses and enjoys the waters of the Port of Los Angeles, its inflows, outflows, and other waters of the San Pedro Bay. Guzman's use and enjoyment of these waters are negatively affected by the pollution caused by Potential's operations. Additionally, Guzman acts in the interest of the general public to prevent pollution in these waterways, for the benefit of their ecosystems, and for the benefits of all individuals and communities who use these waterways for various recreational, educational, and spiritual purposes.

This letter addresses Potential's unlawful discharge of pollutants from the Facility via stormwater into the Port of Los Angeles and ultimately into San Pedro Bay. Specifically, investigation of the Facility has uncovered significant, ongoing, and continuous violations of the CWA and the National Pollutant Discharge Elimination System ("NPDES") General Permit No CAS000001 [State Water Resources Control Board] Water Quality Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ (the "Industrial Stormwater Permit").¹

CWA section 505(b) requires that sixty (60) days prior to the initiation of a civil action under CWA section 505(a), a citizen must give notice of his or her intent to file suit. 33 U.S.C. § 1365(b). Notice must be given to the alleged violator, the U.S. Environmental Protection Agency ("EPA"), and the State in which the violations occur. As required by section 505(b), this Notice of Violation and Intent to File Suit provides notice to Potential of the violations that have occurred and which continue to occur at the Facility. After the expiration of sixty (60) days from the date of this Notice of Violation and the Intent to File Suit, Guzman intends to file suit in federal court against Potential under CWA section 505(a) for the violations described more fully below.

During the 60-day notice period, Guzman is willing to discuss effective remedies for the violations noticed in this letter. We suggest that Potential contact Guzman's attorneys at Brodsky & Smith within the next twenty (20) days so that these discussions may be completed by the conclusion of the 60-day notice period. Please note that we do not intend to delay the filing of a complaint in federal court, and service of the complaint shortly thereafter, even if discussions are continuing when the notice period ends.

I. THE LOCATION OF THE ALLEGED VIOLATIONS

A. The Facility

Potential's Facility is located at 922 East E. Street in Wilmington, California. At the Facility, Potential processes recyclables and waste materials for disposal, and conducts equipment maintenance. Other activities carried out in the regular course of business at the Facility include trans-loading baled recycled materials, building maintenance (cleaning, service, repairs,), paper/plastic/aluminum sorting and baling and various repair and maintenance activities. Repair and maintenance activities carried out at the facility include, but are not limited to, electrical, plumbing, roofing, asphalt, concrete, and utilities repairs as well as janitorial duties. Possible pollutants from the Facility include total suspended solids ("TSS"), waste oils, lubricants, fuel, trash, debris, hazardous materials, chemical oxygen demand ("COD"), oil and grease, pH, heavy metals, such as aluminum, copper, iron, lead, and zinc, and other pollutants. Stormwater from the Facility discharges, via the local storm sewer system and/or surface runoff directly into the Port of Los Angeles which flows into San Pedro Bay.

B. The Affected Water

The Port of Los Angeles and San Pedro Bay are waters of the United States. The CWA requires that water bodies such as the Port of Los Angeles and San Pedro Bay meet water quality objectives that protect specific "beneficial uses." The beneficial uses of the Port of Los Angeles and San Pedro Bay include commercial and sport fishing, estuarine habitat, fish migration, navigation, preservation of rare and endangered species, water contact and non-contact recreation, shellfish harvesting, fish spawning, and wildlife habitat. Contaminated stormwater from the Facility adversely affects the water quality of the Port of Los Angeles and San Pedro Bay and threatens the beneficial uses and ecosystem of these watersheds, which includes habitats for threatened and endangered species.

¹ On April 1, 2014, the State Water Resources Control Board adopted an updated NPDES General Permit for Discharges Associated with Industrial Activity, Water Quality Order No. 2014-57-DWQ, which has taken force or effect on its effective date of July 1, 2015. As of the effective date, Water Quality Order No. 2014-57-DWQ has superseded and rescinded the prior Industrial Stormwater Permit except for purposes of enforcement actions brought pursuant to the prior permit.

II. THE FACILITY'S VIOLATIONS OF THE CLEAN WATER ACT

It is unlawful to discharge pollutants to waters of the United States, such as the Port of Los Angeles or San Pedro Bay, without an NPDES permit or in violation of the terms and conditions of an NPDES permit. CWA § 301(a), 33 U.S.C. § 1311(a); *see also* CWA § 402(p), 33 U.S.C. § 1342(p) (requiring NPDES permit issuance for the discharge of stormwater associated with industrial activities). The Industrial Stormwater permit authorizes certain discharges of stormwater, conditioned on compliance with its terms.

Potential has submitted a Notice of Intent ("NOI") to be authorized to discharge stormwater from the Facility under the Industrial Stormwater Permit since at least 2012. However, information available to Guzman indicates that stormwater discharges from the Facility have violated several terms of the Industrial Stormwater Permit and the CWA. Apart from discharges that comply with the Industrial Stormwater Permit, the Facility lacks NPDES permit authorization for any other discharges of pollutants into waters of the United States.

A. Discharges in Excess of BAT/BCT Levels

The Effluent Limitations of the Industrial Stormwater Permit prohibit the discharge of pollutants from the facility in concentrations above the level commensurate with the application of best available technology economically achievable ("BAT") for toxic pollutants² and best conventional pollutant control technology ("BCT") for conventional pollutants.³ Industrial Stormwater Permit, Order Part B(3). The EPA has published Benchmark values set at the maximum pollutant concentration present if an industrial facility is employing BAT and BCT, as listed in Attachment 1 to this letter.⁴

Potential's self-reporting of industrial stormwater discharges show a pattern of exceedances of Benchmark values in every instance of self-reporting. *See* Attachment 2. Furthermore Potential's self-reporting is lacking in that over a period of at least four (4) years Potential has self-reported stormwater sampling on only two (2) dates. This pattern of exceedances of benchmark values and lack of self-reporting indicate that Potential has failed and is failing to employ measures that constitute BAT and BCT in violation of the requirements of the Industrial Stormwater Permit. Guzman alleges and notifies Potential that its stormwater discharges from the Facility have consistently contained and continue to contain levels of pollutants that exceed Benchmark Values for TSS, zinc, iron, aluminum, and lead.

Potential's ongoing discharges of stormwater containing levels of pollutants above EPA Benchmark values and BAT and BCT based levels of control also demonstrate that Potential has not developed and implemented sufficient Best Management Practices ("BMPs") at the Facility. Proper BMPs could include, but are not limited to, moving certain pollution-generating activities under cover or indoors capturing and effectively filtering or otherwise treating all stormwater prior to discharge, frequent sweeping to reduce build-up of pollutants on-site, installing filters on downspouts and storm drains, and other similar measures. Notably, investigation of the Facility has revealed unattended outdoor heaps of refuse and debris, loose debris strewn about outdoor areas of the facility, oil runoff, a lack of grated/filtered downspouts, and practices clearly not keeping with BMPs.

² BAT is defined at 40 C.F.R. § 442.23. Toxic pollutants are listed at 40 C.F.R. § 401.15 and include copper, lead, and zinc, among others.

³ BCT is defined at 40 C.F.R. § 442.22 Conventional pollutants are listed at 40 C.F.R. § 401.16 and include BOD, TSS, oil and grease, pH, and fecal coliform.

⁴ The Benchmark values are part of the EPA's Multi-Sector General Permit ("MSGP") and can be found at: http://www.epa.gov/npdes/pubs/msgp2008_finalpermit.pdf. *See* 73 Fed. Reg. 56, 572 (Sept. 29, 2008) (Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Industrial Activities).

Potential's failure to develop and/or implement adequate pollution controls to meet BAT and BCT and the Facility violates and will continue to violate the CWA and the Industrial Stormwater Permit each and every day Potential discharges stormwater without meeting BAT/BCT. Guzman alleges that Potential has discharged stormwater containing excessive levels of pollutants from the Facility to the Port of Los Angeles and San Pedro Bay during at least every significant local rain event over 0.1 inches in the last four (4) years.⁵ Attachment 3 compiles all dates in the last four (4) years when a significant rain event occurred. Potential is subject to civil penalties for each violation of the Industrial Stormwater Permit and the CWA within the past five (5) years.

B. Discharges Impairing Receiving Waters

The Industrial Stormwater Permit's Discharge Prohibitions disallow stormwater discharges that cause or threaten to cause pollution, contamination, or nuisance. *See* Industrial Stormwater Permit, Order Part A(2). The Industrial Stormwater Permit also prohibits stormwater discharges to surface or groundwater that adversely impact human health or the environment. *Id.* at Order Part C(1). Receiving Water Limitations of the Industrial Stormwater Permit prohibit stormwater discharges that cause or contribute to an exceedance of applicable Water Quality Standards ("WQS") contained in a Statewide Water Quality Control Plan or the applicable Regional Water Board's Basin Plan. *Id.* at Order Part C(2). Applicable WQS are set forth in the California Toxic Rule ("CTR")⁶ and Chapter 3 of the Los Angeles Region (Region 4) Water Quality Control Plan (the "Basin Plan").⁷ *See* Attachment 1. Exceedances of WQS are violations of the Industrial Stormwater Permit, the CTR, and the Basin Plan.

The Basin Plan establishes WQS for the Coastal Watersheds of Los Angeles and Ventura Counties, including but not limited to the following:

- Waters shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial users.
- Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases in natural turbidity attributable to controllable water quality factors shall not exceed 20% where natural turbidity is between 0 and 50 nephelometric turbidity units ("NTU"), and shall not exceed 10% where the natural turbidity is greater than 50 NTU.
- All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant, animal, or aquatic life.
- Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use.

Guzman alleges that Potential's stormwater discharges have caused or contributed to exceedances of Receiving Water Limitations in the Industrial Stormwater Permit and the WQS set forth in the Basin Plan and CTR. These allegations are based on Potential's self-reported data submitted to the Los Angeles Regional Water Quality Control Board. These sampling results indicate that Potential's discharges are causing or threatening to cause pollution, contamination, and/or nuisance; adversely impacting human

⁵ Significant local rain events are reflected in the rain gauge data available at: <http://www.ncdc.noaa.gov/cdo-web/search>.

⁶ The CTR is set forth at 40 C.F.R. § 131.38 and is explained in the Federal Register preamble accompanying the CTR promulgation set forth at 65 Fed. Reg. 31, 682 (May 18, 2000).

⁷ The Basin Plan is published by the Los Angeles Regional Water Quality Control Board at: http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.shtml. (Last accessed on 10/08/2015).

health or the environment; and violating applicable WQS. For example, Potential's sampling results indicate exceedances of WQS for zinc and lead. *See* Attachment 2.

Guzman alleges that each day that Potential has discharged stormwater from the Facility, Potential's stormwater has contained levels of pollutants that exceeded on or more of the Receiving Water Limitations and/or applicable WQS in the Los Angeles Coastal Watershed (which includes the Port of Los Angeles and San Pedro Bay). Guzman alleges that Potential has discharged stormwater exceeding Receiving Water Limitations and/or WQS from the Facility to the Port of Los Angeles and San Pedro Bay during at least every significant local rain event over 0.1 inches in the last four (4) years. *See* Attachment 3. Each discharge from the Facility that violates a Receiving Water Limitation or has caused or contributed, or caused or contributes, to an exceedance of an applicable WQS constitutes a separate violation of the Industrial Stormwater Permit and the CWA. Potential is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA within the past five (5) years.

C. Failure to Develop and Implement an Adequate Stormwater Pollution Prevention Plan

The Industrial Stormwater Permit requires dischargers to develop and implement an adequate Storm Water Pollution Prevention Plan ("SWPPP"). Industrial Stormwater Permit, Section A(1)(a). The Industrial Stormwater Permit also requires dischargers to make all necessary revisions to existing SWPPPs promptly. *Id.* at Order Part E(2).

The SWPPP must include, among other requirements, the following: a site map, a list of significant materials handled and stored at the site, a description and assessment of all potential pollutant sources, a description of the BMPs that will reduce or prevent pollutants in stormwater discharges, specification of BMPs designed to reduce pollutant discharge to BAT and BCT levels, a comprehensive site compliance evaluation completed each reporting year, and revisions to the SWPPP within 90 days after a facility manager determines that the SWPPP is in violation of any requirements of the Industrial Stormwater Permit. *See* Industrial Stormwater Permit, Section A.

Based on information available to Guzman, Potential has failed to prepare and/or implement an adequate SWPPP and/or failed to revise the SWPPP to satisfy each of the requirements of Section A of the Industrial Stormwater Permit. For Example, Potential's SWPPP does not include and/or Potential has not implemented adequate BMPs designed to reduce pollutant levels in discharges to BAT and BCT levels in accordance with Section A(8) of the Industrial Stormwater Permit, as evidenced by the data in Attachment 2.

Accordingly, Potential has violated the CWA each and every day that it has failed to develop and/or implement an adequate SWPPP meeting all of the requirements of Section A of the Industrial Stormwater Permit, and Potential will continue to be in violation every day until it develops and implements an adequate SWPPP. Potential is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA occurring within the past five (5) years.

D. Failure to Develop and Implement an Adequate Monitoring and Reporting Program and to Perform Annual Comprehensive Site Compliance Evaluations

The Industrial Stormwater Permit requires facility operators to develop and implement a Monitoring and Reporting Program ("MRP"). *See* Industrial Stormwater Permit, Section B(1) and Order Part E(3). The Industrial Stormwater Permit requires that MRP ensure that each the facility's stormwater discharges comply with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in the Industrial Stormwater Permit. *Id.* at Section B(2). Facility operators must ensure that their MRP practices reduce or prevent pollutants in stormwater and authorized non-stormwater discharges as well as evaluate and revise their practices to meet changing conditions at the facility. *Id.* This may include revising the SWPPP as required by Section A of the Industrial Stormwater Permit.

The MRP must measure the effectiveness of BMPs used to prevent or reduce pollutants in stormwater and authorized non-stormwater discharges, and facility operators must revise the MRP whenever appropriate. *Id.* at Section B(2). The Industrial Stormwater Permit requires facility operators to visually observe and collect samples of stormwater discharges from all drainage areas. *Id.* at Section B(7). Facility operators are also required to provide an explanation of monitoring methods describing how the facility's monitoring program will satisfy these objectives. *Id.* at Section B(10).

Potential has been operating the Facility with an inadequately developed and/or inadequately implemented MRP, in violation of the substantive and procedural requirements set forth in Section B of the Industrial Stormwater permit. For example, the data in Attachment 2 indicates that Potential's monitoring program has not ensured that stormwater dischargers are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations of the Industrial Stormwater Permit as required by the Section B(2). The monitoring has not resulted in practices at the Facility that adequately reduce or prevent pollutants in stormwater as required by Section B(2) of the Industrial Stormwater Permit. Similarly, the data in Attachment 2 indicates that Potential's monitoring program has not effectively identified or responded to compliance problems at the Facility or resulted in effective revision of the BMPs in use or the Facility's SWPPP to address such ongoing problems as required by Section B(2).

As a part of the MRP, the Industrial Stormwater Permit specifies that Facility operators shall collect stormwater samples during "the first hour of discharge from (1) the first storm event of the wet season, and (2) at least one other storm event in the wet season." *See* Industrial Stormwater Permit Section B(5)(a). Furthermore, should facility operators fail to collect samples from the first storm event of the wet season, they are still required to collect samples from two other storm events during the wet season, and explain in the annual report why the first storm event was not sampled. *Id.* Potential, in clear violation of the terms of the Industrial Stormwater Permit, has failed to report any stormwater sampling data for the entirety of 2012, 2013, and 2014, despite the fact that there were several days during that time period with precipitation one-tenth of an inch or greater. *See* Attachments 2, 3. Furthermore, Potential has failed to adequately explain why such sampling was not included for the years of 2012, 2013, and 2014.

As a result of Potential's failure to adequately develop and/or implement an adequate MRP at the Facility, Potential has been in daily and continuous violation of the Industrial Stormwater Permit and the CWA each and every day for the past four (4) years. These violations are ongoing. Potential will continue to be in violation of the monitoring and reporting requirement each day that Potential fails to adequately develop and/or implement an effective MRP at the Facility. Potential is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA occurring for the last five (5) years.

E. Unpermitted Discharges

Section 301(a) of the CWA prohibits the discharge of any pollutant into waters of the United States unless the discharge is authorized by a NPDES Permit issued pursuant to Section 402 of the CWA. *See* 33 U.S.C. §§ 1311(a), 1342. Potential sought coverage for the Facility under the Industrial Stormwater Permit, which states that any discharge from an industrial facility not in compliance with the Industrial Stormwater Permit "must be either eliminated or permitted by a separate NPDES permit." Industrial Stormwater Permit, Order Part A(1). Because Potential has not obtained coverage under a separate NPDES permit and has failed to eliminate discharges not permitted by the Industrial Stormwater Permit, each and every discharge from the Facility described herein not in compliance with the Industrial Stormwater Permit has constituted and will continue to constitute a discharge without CWA Permit coverage in violation of section 301(a) of the CWA, 33 U.S.C. § 1311(a).

IV. PERSON RESPONSIBLE FOR THE VIOLATIONS

Potential Industries, Inc. is the person responsible of the violations at the Facility described above.

IV. NAME AND ADDRESS OF NOTICING PARTY

Carlos Guzman
879 West 5th Street, Ste. # 3
San Pedro, CA 90732
(424) 264-8191

V. COUNSEL

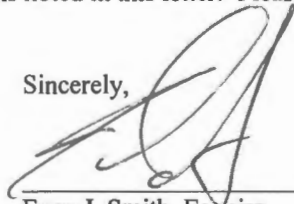
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VI. REMEDIES

Guzman intends, at the close of the 60-day notice period or thereafter, to file a citizen suit under CWA section 505(a) against Potential for the above-referenced violations. Guzman will seek declaratory and injunctive relief to prevent further CWA violations pursuant to CWA sections 505(a) and (d), 33 U.S.C. § 1365(a) and (d), and such other relief as permitted by law. In addition, Guzman will seek civil penalties pursuant to CWA section 309(d), 33 U.S.C. § 1319(d), and 40 C.F.R. § 19.4, against Potential in this action. The CWA imposes civil penalty liability of up to \$37,500 per day per violation for violations occurring after January 12, 2009. 33 U.S.C. § 1319(d); 40 C.F.R. § 19.4. Guzman will seek to recover attorneys' fees, experts' fees, and costs in accordance with CWA section 505(d), 33 U.S.C. § 1365(d).

As noted above, Guzman and his Counsel are willing to meet with you during the 60-day notice period to discuss effective remedies for the violations noted in this letter. Please contact me to initiate these discussions.

Sincerely,



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**ATTACHMENT 1: EPA BENCHMARKS AND WATER QUALITY STANDARDS FOR
DISCHARGES TO SALTWATER**

A. EPA Benchmarks, 2008 Multi-Sector General Permit (“MSGP”)

Parameter	Units	Benchmark Value	Source
Chemical Oxygen Demand (COD)	Mg/L	120	2008 MSGP
Total Suspended Solids (TSS)	Mg/L	120	2008 MSGP
Aluminum Total Recoverable	Mg/L	0.75	2008 MSGP
Total Copper	Mg/L	0.0048	2008 MSGP
Total Recoverable Iron	Mg/L	1.0	2008 MSGP
Total Lead	Mg/L	0.2	2008 MSGP
Total Zinc	Mg/L	0.09	2008 MSGP

**B. Water Quality Standards – Discharge Limitations and Monitoring Requirements
(40 CFR Part 131.38 (California Toxics Rule or CTR), May 18, 2000)**

Parameter	Units	Water Quality Objectives		Source
		4- Day Average	1-Hr Average	
Lead	Mg/L	0.0081	0.21	40 CFR Part 131.38
Zinc	Mg/L	0.081	0.090	40 CFR Part 131.38

ATTACHMENT 2: TABLE OF EXCEEDENCES FOR POTENTIAL INDUSTRIES INC.

The following table contains each stormwater sampling result which exceeds EPA Benchmarks and/or causes or contributes to an exceedance of CFR and/or Basin Plan Water Quality Standards. All EPA Benchmarks and CFR and/or Basin Plan Water Quality Standards are listed in Attachment 1. All stormwater samples were reported by the Facility during the past four (4) years.

Reporting Period	Sample Date	Parameter	Result	Unit
2014-2015	05/14/2015	Zinc, Total	0.313	Mg/L
2014-2015	05/14/2015	Iron, Total	1.73	Mg/L
2014-2015	05/14/2015	Aluminum, Total	1.07	Mg/L
2014-2015	05/14/2015	TSS	131	Mg/L
2014-2015	05/14/2015	Zinc, Total	0.417	Mg/L
2014-2015	05/14/2015	Iron, Total	3.08	Mg/L
2014-2015	05/14/2015	Aluminum, Total	1.84	Mg/L
2014-2015	05/14/2015	TSS	132	Mg/L

**ATTACHMENT 3: ALLEGED DATES OF EXCEEDANCES BY
POTENTIAL INDUSTRIES, INC.
January 1, 2012 – September 30, 2015**

Days with precipitation one-tenth of an inch or greater, as reported by NOAA's National Climatic Data Center, Long Beach Daugherty Field, CA Station, GHCND:U SW00023129, when a stormwater discharge from the Facility is likely to have occurred. <http://www.ncdc.noaa.gov/cdo-web/search>

2012	2013	2014	2015
1/21	1/24	2/6	1/10
1/23	1/25	2/27	1/11
2/15	2/8	2/28	2/22
2/27	2/19	3/1	3/2
3/17	3/8	3/2	4/7
3/18	5/5	4/1	5/8
3/25	5/6	4/2	5/14
4/10	5/7	4/25	7/18
4/11	11/20	9/8	7/19
4/13	11/21	10/31	9/15
4/25	11/29	11/1	
4/26	12/7	11/30	
10/12	12/19	12/1	
11/8		12/2	
11/29		12/3	
11/30		12/12	
12/2		12/16	
12/3		12/17	
12/12			
12/13			
12/18			
12/24			
12/26			
12/29			